

REMARKS

As a preliminary matter, claims 1, 4 and 5 are objected to based on the reasons set forth on page 2 of the Office Action. Applicants believe that the Examiner's objections to claims 1, 4 and 5 should be withdrawn.

Claims 1-5 are all the claims pending in the present application. Claims 1 and 2 are provisionally rejected under 35 U.S.C. § 101 as allegedly claiming the same invention as that of claims 1 and 2 of Appln. No. 10/746,234 (Your Ref: SH-18568-US; Our Ref: Q79034), hereinafter referred to as Park '234. Claims 4 and 5 are provisionally rejected under 35 U.S.C. § 101 as allegedly claiming the same invention as that of claims 6 and 7 of Park '234. Claims 1-5 are rejected under 35 U.S.C. § 101 because the claimed invention is allegedly directed to non-statutory subject matter. Finally, claims 1-5 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Hinden et al. (RFC 2373, "IP Version 6 Addressing Architecture"), hereinafter referred to as Hinden, and Lee et al. ("A New Control Protocol for Home Appliances - LnCP"), hereinafter referred to as Lee.

§101 Provisional Double Patenting Rejections - Claims 1 and 2

Claims 1 and 2 are provisionally rejected under 35 U.S.C. § 101 as allegedly claiming the same invention as that of claims 1 and 2 of Park '234 based on the reasons set forth on pages 2-3 of the present Office Action.

Applicant respectfully requests that the Examiner hold this rejection in abeyance until one or the other of the two pending applications issues as a patent. Specifically, according to MPEP § 804 I.B., if a provisional double patenting rejection in one application is the only rejection remaining, then the Examiner should withdraw the provisional rejection and permit that application to issue as a patent, thereby converting the provisional double patenting rejection in

the other application, i.e., the Park '234 application, into a bona fide double patenting rejection at the time the one application issues as a patent. Thus, if all other claim rejections are withdrawn, claims 1 and 2 should be found allowable and the present application should be permitted to issue as a patent

§101 Provisional Double Patenting Rejections - Claims 4 and 5

Claims 4 and 5 stand provisionally rejected under 35 U.S.C. § 101 as claiming the same invention as that of claims 6 and 7 of Park '234.

As similarly indicated above, Applicant respectfully requests that the Examiner hold the rejection in abeyance.

§101 Rejections - Claims 1-5

Claims 1-5 are rejected as allegedly being directed to non-statutory subject matter based on the reasons set forth on pages 3-5 of the present Office Action.

With respect to claim 1, Applicant believes that claim 1 satisfies 35 U.S.C. § 101.

With respect to claim 4, Applicant believes that claim 4 satisfies 35 U.S.C. § 101.

Yet further, Applicants believe that claim 4 satisfies §101.

For at least the above reasons, Applicant requests that the 35 U.S.C. § 101 rejections of claims 1-5 be withdrawn.

§103(a) Rejections - (Hinden/Lee) - Claims 1-5

Claims 1-5 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Hinden and Lee based on the reasons set forth on pages 5-7 of the present Office Action.

With respect to independent claim 1, Applicant submits that the applied references, either alone or in combination, do not disclose or suggest at least, "identifying the devices using device ID information for identifying types of the devices recorded in an area, excluding a company ID

area and a serial number area of an interface ID area, using an extended unique identifier (EUI-64) ID format,” as recited in claim 1. The Examiner asserts that Hinden discloses an interface ID having a company ID and a serial number area, thereby citing page 19 and page 21 of Hinden. Hinden discloses, in part, transforming an EUI-64 identifier to an interface identifier by inverting the “u” (universal/local) bit. Hinden discloses a “c” bit which is a company id, a “0” bit which is the value of the universal/local bit indicating global scope, a “g” bit which is an individual/group bit, and an “m” bit which is the manufacturer-selected extension identifier. However, there is no teaching or suggestion of device ID information recorded in an area, excluding a company ID area and a serial number area of an interface ID area. Further, there is no teaching or suggestion of a serial number area in Hinden.

Yet further, the cited portion of Hinden discusses an interface ID, however, there is no teaching or suggestion of a serial number area being part of the interface ID discussed in Hinden. On the contrary, claim 1 describes that a company ID area and a serial number area constitute an interface ID area (e.g., “a company ID area and a serial number area of an interface ID area”).

Yet further, the Examiner acknowledges that Hinden does not disclose “a device ID area recorded in the interface ID in an area excluding the serial number and company ID area and that the device ID is between the company ID area and the serial number area. The Examiner alleges, however, that Lee makes up for the deficiencies of Hinden. Specifically, the Examiner alleges:

The general concept of a device ID area being concatenated with a serial number area is well known in the art as taught by Lee. (Page 288, col. 2, section 5.1 designates a product code area to address types of devices. Note Fig. 5, which teaches putting the device ID before the address range used to uniquely identify types of devices (i.e., the serial number area)). In addition, using the device identification scheme proposed by Fig. 5 as the selected extension

identifier the Product code will fall on the fourth upper byte of the interface ID.

In response, first, Applicant maintains, as indicated above, that there is no serial number area identified in Lee. The Examiner cites Fig. 5 of Lee, and alleges that Lee teaches putting a product code before an address range used to uniquely identify types of devices. However, Fig. 5 of Lee is not a structure of any type of identifier but is just a table that has the columns: a) product name, b) product code, and c) address range. It does not identify how a product code and address range might be structured in any type of identifier. Fig. 4, on the other hand, does show the structure of an address field. However, clearly there is no description of a serial number area in the structure of Fig. 4. Therefore, claims 3 and 5 are clearly not satisfied by the applied references, either alone or in combination.

Yet even further, since Fig. 5 is clearly not a structure for identifying a device, but, as indicated above, is simply a table, the Examiner is inaccurate in alleging that, "using the device identification scheme proposed by Fig. 5 as the selected extension identifier the Product code will fall on the fourth upper byte of the interface ID."

Additionally, Applicant submits that one of ordinary skill in the art would not have been led to combine Hinden with Lee as these two references are directed to very different inventions. Specifically, Hinden is directed to a specification/standard defining the addressing architecture of the IP version 6 protocol. Differently, as indicated in the Abstract of Lee, Lee proposes an entirely new control protocol, LnCP (living network control protocol), for linking home appliances and controlling said appliances from a remote location. Nowhere does Lee, which was published after the Hinden reference, discuss implementation of the architectures or standards of IPv6. Furthermore, the specific interface identifier, which is described as an integral part of the IPv6 standard, is nowhere discussed in Lee.

Therefore, at least based on the foregoing, Applicant submits that claims 1-5 are patentably distinguishable over the applied references, either alone or in combination.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

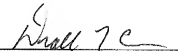
Respectfully submitted,

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER


Diallo T. Crenshaw
Registration No. 52,778

Date: July 16, 2007